

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

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In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD OF PUERTO RICO,

PROMESA  
Title III

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*  
*al.*,<sup>1</sup>

No. 17 BK 3283-LTS  
(Jointly Administered)

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Debtors.

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**INFORMATIVE MOTION OF THE QTCB NOTEHOLDER  
GROUP REGARDING OCTOBER 28-29, 2020 OMNIBUS HEARING**

The QTCB Noteholder Group<sup>2</sup> hereby submits this informative motion pursuant to the Court's *Order Regarding Procedures for October 28-29, 2020, Omnibus Hearing* (Case No. 17-BK-3283, Dkt. No. 14619), and respectfully states as follows:

1. Kurt A. Mayr, Sabin Willett, and David L. Lawton of Morgan, Lewis & Bockius LLP will appear telephonically on behalf of the QTCB Noteholder Group at the October 28-29, 2020, omnibus hearing, to address, as necessary, the following matters:

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID 9686); (v) Puerto Rico Electric Power Authority (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (Bankruptcy Case No. 19 BK 5523-LTS) (Last Four Digits of Federal Tax ID: 3801). (Title III case numbers listed as Bankruptcy Case numbers due to software limitations).

<sup>2</sup> The QTCB Noteholder Group has the same meaning as set forth in *Notice of Appearance and Request for Notice* (Dkt. No. 134, Case No. 17-3283 LTS) and *Seventh Supplemental Verified Statement of the QTCB Noteholder Group Pursuant to Bankruptcy Rule 2019* (Dkt. No. 14708, Case No. 17-3283 LTS).

- a. *Joint Motion of PSA Creditors Pursuant to Section 312 of PROMESA and Section 105 of the Bankruptcy Code to Impose Deadlines for Plan of Adjustment* [Dkt. No. 14478] (the “PSA Creditor Motion”);
- b. *Motion of National Public Finance Guarantee Corporation for Entry of an Order Directing Independent Investigation* [Dkt. No. 14450] (the “National Motion”);
- c. *Official Committee of Unsecured Creditors’ Limited Joinder in Motion of National Public Finance Corporation for Entry of an Order Directing and Independent Investigation*, [Dkt. No. 14527] (the “UCC Joinder”);
- d. *Objection of QTCB Noteholder Group to the National Motion and UCC Joinder* [Dkt. No. 14553] (the “QTCB Objection”); and
- e. Any objections, responses, statement, joinders or replies regarding the PSA Creditor Motion, National Motion, UCC Joinder or QTCB Objection.

2. Counsel further reserves the right to be heard on any matter presented to the Court and to respond to any statements made by any party in connection with the above-captioned Title III cases, and/or any adversary proceeding pending in the Title III cases.

**WHEREFORE**, the QTCB Noteholder Group respectfully requests that the Court take notice of the foregoing.

*[Remainder of page intentionally left blank]*

**RESPECTFULLY SUBMITTED,**

Dated: October 22, 2020  
San Juan, Puerto Rico

**Morgan, Lewis & Bockius LLP**

/s/ Kurt A. Mayr

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*Co-Counsel for the QTCB Noteholder Group*

**I HEREBY CERTIFY** that on October 22, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send automatic notifications of such filing to all attorneys of record.

**CORREA ACEVEDO & ABESADA  
LAW OFFICES, P.S.C.**

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